FILED

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION OCT 2 6 2015

U.S. DISTRICT COURT EASTERN DISTRICT OF MC ST. LOUIS

UNITED STATES OF AMERICA, Plaintiff,	}
V.	3 4 4:15CR00486 HEA
BLISS BARBER WORRELL, Defendant.)

INFORMATION

The United States Charges that:

COUNT 1

On or between July 23, 2014, through July 24, 2014, within the Eastern District of Missouri,

BLISS BARBER WORRELL,

while acting in her capacity as a prosecutor for the St. Louis Circuit Attorney's Office, and while knowing that a felony cognizable by a court of the United States had occurred, failed to notify authorities of the felony; and took an affirmative step to conceal the felony. That is, defendant Bliss Barber Worrell knew that an officer with the St. Louis Metropolitan Police Department, while acting under color of law, willfully deprived an arrestee in his custody of his Constitutional right to be free from unreasonable force by physically assaulting the arrestee, to include putting his firearm in the arrestee's mouth; that the defendant well knew that the arrestee had been assaulted moments after being transported to the police station, but contrary to her obligations as a prosecutor, filed charges including Attempted Escape against the arrestee without disclosing knowledge of the assault to her colleagues and supervisors when making the charging decision, and that the defendant then presented the charges to a judge without disclosing knowledge of the

assault, knowing that disclosing the assault could affect said determination. The defendant further allowed the charges to stand despite later learning that the facts that made out the Attempted Escape charge were fabricated to cover for injuries the arrestee sustained during the assault.

In violation of Title 18, United States Code, Section 4.

Respectfully submitted/

TAMMY DICKINSON
United States Attorney
Western District of Missouri

DAVID M. KETCHMARK
Special Attorney to the United States

Attorney General

FARA GOLD

Trial Attorney

Civil Rights Division, Criminal Section

U.S. Department of Justice

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UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Fara Gold, Trial Attorney for the U.S. Department of Justice, being duly sworn, do say that the foregoing information is true as I verily believe.

FARA GOLD

Trial Attorney

Civil Rights Division, Criminal Section

U.S. Department of Justice

Subscribed and sworn to before me this 22^{nd} day of October 2015.

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DEPUTY CLERK